

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: James D Ziegler
Debtor

Fay Servicing, LLC as Servicer for
U.S. Bank Trust National
Association, not in its individual
capacity but solely as Trustee of
LSF9 Master Participation Trust
Movant
v.

James D Ziegler
Patti Jo Ziegler- Co-Debtor
Kenneth E. West- Trustee
Respondents

Case No.: 22-10040-mdc

Chapter: 13

Judge: Magdeline D. Coleman

Hearing Date: May 24, 2022 at 10:30 am

Objection Deadline: May 13, 2022

**NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY AND CO-DEBTOR STAY**

Fay Servicing, LLC as Servicer for U.S. Bank Trust National Association, not in its individual capacity but solely as Trustee of LSF9 Master Participation Trust has filed a Motion for Relief from Stay and Co-Debtor Stay with the Court in order to gain Court authority to foreclose on real property known as 122 Fernwood Rd, Cochranville, PA 19330

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before May 13, 2022 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lauren M. Moyer, Esquire
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on the 24th day of May 2022, at 10:30 A.M., at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: April 29, 2022

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
Bankruptcy@FriedmanVartolo.com

TO:

Trustee

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Debtor's Counsel

Christopher Constantine Carr, Esquire
Law Offices of Christopher C. Carr
3240 Tynning Lane
Downingtown, PA 19335

U.S. Trustee

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Debtor

James D Ziegler
122 Fernwood Road
Cochranville, PA 19330-1116

Co-Debtors

Patti Jo Ziegler
122 Fernwood Rd
Cochranville, PA 19330